

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

JOHNNY M. RODRIGUEZ,	)	CASE NO.: 8:04CV576
	)	
Plaintiff,	)	
	)	
vs.	)	PROTECTIVE ORDER REGARDING
	)	PLAINTIFF'S MEDICAL RECORDS
	)	
UNION PACIFIC CORPORATION,	)	
	)	
Defendant.	)	

IT IS HEREBY STIPULATED AND ORDERED as follows:

1. Defendant has served Requests for Production of Documents and Interrogatories which seek confidential information concerning Plaintiff's medical condition. Subject to the terms of this Protective Order, Plaintiff must produce the responsive documents and responses to the discovery served on him by Defendants.

2. As provided below, Defendant may use the information concerning Plaintiff's medical condition only for trial preparation, discovery, and trial in this action.

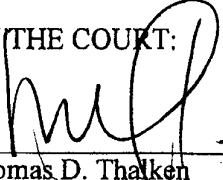
3. Defendant may disclose information on plaintiff's medical condition to all witnesses and potential witnesses, including but not limited to, experts or consultants, the Court, jurors, court reporters, and associate clerical employees and legal assistants, provided that any person to whom the information is disclosed has a need to know the contents of the information.

4. Within thirty (30) days of settlement or the conclusion of litigation in this action, Defendant shall return to Plaintiff all documents produced concerning his medical condition.

IT IS SO ORDERED:

DATED this 14<sup>th</sup> day of July, 2005.

BY THE COURT:

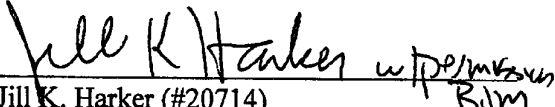
  
\_\_\_\_\_  
Thomas D. Thalken  
United States Magistrate Judge

PREPARED & SUBMITTED BY:

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APPROVED AS TO FORM AND CONTENT

  
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